



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PJC
F. #2021R00440

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 9, 2024

By ECF

The Honorable Allyne R. Ross
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Feng Jiang
Criminal Docket No. 24-264 (ARR)

Dear Judge Ross:

The government moves the Court to enter the attached proposed protective order pursuant to Federal Rule of Criminal Procedure 16(d). The discovery materials in this matter include voluminous records containing individually identifiable health information (defined as health information that is connected to a patient's name, address, Social Security Number or other identifying number, including Medicare HIC number) and financial information entitled to be kept confidential. The proposed order will expedite the flow of discovery and ensure that individually identifiable health and financial information is adequately protected.

Counsel for the defendant has consented to the entry of the proposed order.

Respectfully submitted,

GLENN S. LEON
Chief, Fraud Section
Criminal Division
U.S. Department of Justice

By: /s/Patrick J. Campbell
Patrick J. Campbell
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Enclosure

cc: Clerk of the Court (ARR) (by ECF)
Counsel of Record (by ECF)